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Office of the Secretary  
Federal Communications Commission  
Washington DC 20054

FEB 11 1993  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
FEB 10 1993

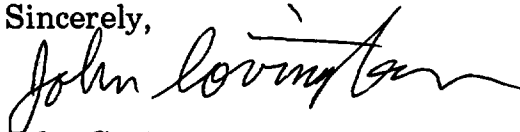
Re: comments on NPRM 92-289

Dear Sir:

FCC MAIL ROOM

Enclosed are my comments on NPRM 92-289, Notice of Creation of 222-225 MHz and 1240-1300 MHz Frequency Bands. I have enclosed an original and nine copies so each Commissioner may have a copy.

Sincerely,



John Covington  
P.O. Box 217122  
Charlotte NC 28221-7122

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Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the matter of

Notice of Creation of 222-225 MHz  
and 1240-1300 MHz Frequency Bands

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PR Docket 92-289

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To: The Commission

COMMENTS OF John M. C. Covington, III

FEB 11 1993

4. I agree with the ARRL that Novices should be given expanded frequency privileges in the 222 MHz band. Since VHF band plans are determined largely by local coordinating councils and local custom, Novices in some areas may not be able to engage in weak-signal communications without being in violation of such band plans. This is also true to a lesser degree for some repeater and packet communications. I would also like to suggest that Novices be given access to the entire 1240-1300 MHz band for the same reasons.

5. I do not believe that Novice licensees should be allowed to be control operators for repeaters. One of the original petitioners argued that Novices should be allowed to operate repeaters because licensees of other radio services such as GMRS and Private Land Mobile are permitted to be licensees of repeaters without being required to pass any additional examination. While this is true, neither of these services are permitted to operate equipment which is not type-accepted; therefore I believe that the current requirement that at least a Technician license is necessary to be a repeater control operator is justified.

### **Conclusion**

6. I suggest that only the proposed change to 97.301, expansion of Novice privileges in the 222 MHz band, be adopted. The changes to segments for repeater operation in this band should be left to local coordinators and should not in this case be mandated by the Commission. Novices should not be allowed to be repeater control operators since they might be using equipment that is not type-accepted.